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November 11, 2020

Judge Richard M. Berman
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *United States v. Robert Hadden*, 20 Cr. 468 (RMB)

Dear Judge Berman:

We are temporary counsel to Robert Hadden in the above-referenced Indictment. We write to update the court regarding the financial statement this Court has ordered Mr. Hadden to submit in advance of deciding whether to appoint CJA counsel on his behalf.

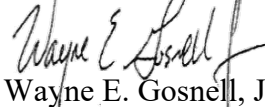
Following our last conference on October 21, 2020, Mr. Hadden sought to engage Peter B. Reynolds, a New Jersey-based CPA for the purpose of preparing a financial statement for submission to this Court. To aid Mr. Reynolds in his task, we provided him with the instructions from Probation for Financial Forms submitted in connection with a Pre-Sentence Investigation Report. On November 4, 2020, Mr. Hadden was informed that Mr. Reynolds would not be able to provide the requested financial statement based on his unavailability and because, in his view, the applicable CPA guidelines for providing a financial report was beyond his capability.

Mr. Hadden then sought to engage Kevin J. Collins, another New Jersey-based CPA. This too resulted in Mr. Collins eventually declining the engagement.

Finally, on November 10, 2020, Mr. Hadden has engaged Mark Koenig, a third New Jersey-based accountant. Mr. Koenig has accepted the engagement and expects to have it completed within two weeks. He has requested that we provide additional specifics as to the nature of the report this Court wants to receive so that he can provide the most pertinent information for this Court's review.

We will be prepared to discuss this matter further during the conference scheduled for November 12, 2020 at 9:30 a.m.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne E. Gosnell, Jr.", written over a horizontal line.

Wayne E. Gosnell, Jr.

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